

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

Dakota Labs Inc.,	)	
	)	
Plaintiff,	)	Case No.: 2:24-cv-10922
	)	
v.	)	
	)	Hon. Susan K. DeClercq
Huron Capital Partners LLC and Michael	)	
Grunza III,	)	
	)	
Defendants.	)	

**PLAINTIFF DAKOTA LABS INC.'S  
APPLICATION FOR WAIVER OF LOCAL COUNSEL  
REQUIREMENT**

Pursuant to Local Rule 83.20(f) of the Local Rules of the United States District Court for the Eastern District of Michigan, Plaintiff Dakota Labs Inc. respectfully requests relief in this case from the requirement to specify local counsel with an office in the District. Local Rule 83.20(f)(1) provides: “On application, the court may relieve an attorney who is not an active member of the State Bar of Michigan of the obligation to specify local counsel.” The basis for this application is as follows:

Dakota Labs has appointed John R. McNair as local counsel and who has made an appearance in this matter. *See* Dkt. No. 22. Mr. McNair is Of Counsel at Winston & Strawn, resides in Ann Arbor, Michigan, and primarily works from his

home address. However, Mr. McNair maintains a business address at 35 West Wacker Dr., Chicago, IL 60601 and accordingly does not maintain “an office in the District.” The undersigned, Ronald Rothstein, is lead counsel in this case and has been admitted to practice in this District since 2018. In that time, counsel has represented clients in this District in one other matter, titled *Wysong v. Big Heart Pet Brands et.al*, Case No. 1:16-cv-11823. Moreover, counsel has extensive experience litigating cases of this sort. Mr. Rothstein will attend all hearings, including in-person hearings if the need arises, as well as be responsible for all papers filed and served in this matter. In addition, Mr. McNair, will attend all in-person hearings should Mr. Rothstein be unable to attend in person. Granting relief from Local Rule 83.20(f)(1) will reduce the costs of this litigation.

The undersigned conferred with opposing counsel concerning this application on July 25, 2024. Opposing counsel does not oppose Plaintiff’s application for waiver.

Dated: July 29, 2024

Respectfully submitted,

WINSTON & STRAWN LLP

/s/ Ronald Y. Rothstein

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